

VICTOR A. VILAPLANA (CA BAR NO. 58535)
vavilaplana@foley.com
MARSHALL J. HOGAN (CA BAR NO. 286147)
mhogan@foley.com
FOLEY & LARDNER LLP
ATTORNEYS AT LAW
3579 VALLEY CENTRE DRIVE, SUITE 300
SAN DIEGO, CA 92130
TELEPHONE: 858.847.6700
FACSIMILE: 858.792.6773

PROPOSED ATTORNEYS FOR DEBTORS
AND DEBTORS-IN-POSSESSION

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

IN RE:

SOTERA WIRELESS, INC.,

DEBTOR.

SOTERA WIRELESS, INC.,

CASE No. 16-05968-LT11

SOTERA RESEARCH, INC.,

CASE No. 16-05969-LT11

LEAD CASE No. 16-05968-LT11

CHAPTER 11

(JOINTLY ADMINISTERED)

**JOINT STIPULATION TO
CONTINUE FINAL HEARING ON
DEBTORS' FIRST DAY MOTION
FOR ENTRY OF INTERIM AND
FINAL ORDERS AUTHORIZING
USE OF CASH COLLATERAL
PURSUANT TO 11 U.S.C. 363**

**Date: October 17, 2016
Time: 10:00 a.m.**

This Joint Stipulation to Continue Final Hearing on Debtors' First Day Motion for Entry of Interim and Final Orders Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. 363 (the "Stipulation") is entered into between the jointly administered debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors") and Oxford Finance, LLC and Silicon Valley Bank (collectively, the "Lenders," together with the Debtors, the "Parties").

RECITALS

1. On September 30, 2016 (the "Petition Date"), Debtors commenced the above-captioned chapter 11 cases (the "Chapter 11 cases") by filing voluntary

1 petitions for relief under chapter 11 of title 11 of the United States Code (the
2 “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern
3 District of California.

4 2. On September 30, 2016, the Debtors filed their First Day Motion for
5 Entry of Interim and Final Orders Authorizing Use of Cash Collateral Pursuant to
6 11 U.S.C. 363 [Dkt. No. 7] (the “Motion”).

7 3. On October 7, 2016, the Bankruptcy Court issued an interim order
8 approving the Debtors’ use of cash collateral on an interim basis [Dkt. No. 43] (the
9 “Interim Order”).

10 4. On October 12, 2016, the Bankruptcy Court issued its Minute Order
11 and Notice of Change in Time Fixed Hearing regarding the Motion and set the
12 final hearing on the Motion for October 13, 2016 at 3:30 pm. (the “Hearing”)

13 5. Due to continued negotiations of the Parties over the terms of the final
14 cash collateral order, the Parties have agreed that the Hearing should be continued
15 to Monday, October 17, 2016 at 10:00 am.

16 WHEREFORE, the Parties hereby stipulate and agree as follows:

17 **STIPULATION**

18 1. Upon approval of this Stipulation or as ordered by the Bankruptcy
19 Court, the Hearing currently scheduled for October 13, 2016 at 3:30 pm shall be
20 continued to October 17, 2016 at 10:00 a.m. in Courtroom 3, Room 129,
21 Weinberger Courthouse before the Honorable Laura S. Taylor.

22 2. The deadline for the Debtors’ authorization to use cash collateral will
23 expire on Monday, October 17, 2016 at 5:00 pm unless otherwise agreed by the
24 Parties or ordered by the Bankruptcy Court.

25 3. Except as expressly modified herein, the Interim Order remains fully
26 enforceable in accordance with its terms.

27 4. This Order is without prejudice to the Parties requesting further
28 continuance of the Hearing.

1 IN WITNESS WHEREOF, the Parties hereto have caused this Stipulation to
2 be duly executed by their respective authorized signatories.

3
4 DATE: OCTOBER 13, 2016

FOLEY & LARDNER LLP

5 BY: /s/ Marshall J. Hogan

6 MARSHALL J. HOGAN

7 PROPOSED ATTORNEYS FOR
8 DEBTORS AND DEBTORS-IN-
POSSESSION

9 DATE: OCTOBER 13, 2016

DLA PIPER LLP (US)

10
11 BY: 

12 TROY ZANDER

13 DLA PIPER LLP (US)
14 2000 AVENUE OF THE STARTS
15 SUITE 400 NORTH TOWER
16 LOS ANGELES, CA 90067-4704
17 TELEPHONE: 310.595.3000
18 FACSIMILE: 310.595.3300

19 COUNSEL FOR OXFORD FINANCE,
20 LLC AND SILICON VALLEY BANK
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